



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

CR 2:23-cr-00149-FMO

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1951(a): Interference and Attempted Interference with Commerce by Extortion; 18 U.S.C. § 2119(2): Carjacking; 18 U.S.C. §§ 981(a)(1)(C), 982, 924; and 28 U.S.C. § 2461(c): Criminal Forfeiture]

DAEKUN CHO,
aka "DK,"

Defendant.

The Grand Jury charges:

COUNTS ONE AND TWO

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim Y.S., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim Y.S. and Victim Y.S.'s business:

1	COUNT	DATE	AMOUNT
2	ONE	November 16, 2020	\$100
3	TWO	December 19, 2020	\$100

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1 COUNTS THREE AND FOUR
2 [18 U.S.C. § 1951(a)]
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On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim J.L., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim J.L. and Victim J.L.'s business:

COUNT	DATE	AMOUNT
THREE	January 12, 2021	\$100
FOUR	February 15, 2021	\$100

1 COUNTS FIVE THROUGH THIRTY-TWO

2 [18 U.S.C. § 1951(a)]

3 On or about the following dates, in Los Angeles County, within
 4 the Central District of California, defendant DAEKUN CHO, also known
 5 as "DK," knowingly and with intent to obtain property, obstructed,
 6 delayed, and affected interstate commerce by committing extortion, in
 7 that defendant CHO obtained property, consisting of money from Victim
 8 S.S., a manager of hostesses catering to karaoke bars, by means of
 9 threatened force, violence, and fear of injury, immediate and future,
 10 to Victim S.S. and Victim S.S.'s business:

COUNT	DATE	AMOUNT
FIVE	December 17, 2020	\$100
SIX	January 17, 2021	\$100
SEVEN	February 15, 2021	\$100
EIGHT	March 16, 2021	\$100
NINE	April 15, 2021	\$200
TEN	May 14, 2021	\$200
ELEVEN	June 15, 2021	\$300
TWELVE	July 16, 2021	\$300
THIRTEEN	August 15, 2021	\$300
FOURTEEN	September 16, 2021	\$300
FIFTEEN	October 16, 2021	\$400
SIXTEEN	November 18, 2021	\$400
SEVENTEEN	December 18, 2021	\$500
EIGHTEEN	January 15, 2022	\$520
NINETEEN	February 15, 2022	\$500
TWENTY	March 17, 2022	\$500

	COUNT	DATE	AMOUNT
1	TWENTY-ONE	April 16, 2022	\$500
2	TWENTY-TWO	May 15, 2022	\$400
3	TWENTY-THREE	June 20, 2022	\$400
4	TWENTY-FOUR	July 14, 2022	\$400
5	TWENTY-FIVE	August 16, 2022	\$400
6	TWENTY-SIX	September 16, 2022	\$500
7	TWENTY-SEVEN	October 19, 2022	\$700
8	TWENTY-EIGHT	November 15, 2022	\$500
9	TWENTY-NINE	December 16, 2022	\$500
10	THIRTY	January 15, 2023	\$500
11	THIRTY-ONE	January 25, 2023	\$400
12	THIRTY-TWO	March 16, 2023	\$500
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1 COUNT THIRTY-THREE

2 [18 U.S.C. § 1951(a)]

3 On or about February 16, 2023, in Los Angeles County, within the
4 Central District of California, defendant DAEKUN CHO, also known as
5 "DK," knowingly and with intent to obtain property, attempted to
6 obstruct, delay, and affect interstate commerce by committing
7 extortion, in that defendant CHO attempted to obtain property,
8 consisting of \$500 from Victim S.S., a manager of hostesses catering
9 to karaoke bars, by means of threatened force, violence, and fear of
10 injury, immediate and future, to Victim S.S. and Victim S.S.'s
11 business.

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1 COUNT THIRTY-FOUR

2 [18 U.S.C. §§ 2119(2), 2(a)]

3 On or about May 8, 2021, in Los Angeles County, within the
4 Central District of California, defendant DAEKUN CHO, also known as
5 "DK," and others known and unknown to the Grand Jury, each aiding and
6 abetting the others, with the intent to cause death and serious
7 bodily harm, knowingly and intentionally took a motor vehicle,
8 namely, a Honda Odyssey minivan, that had been transported, shipped,
9 and received in interstate and foreign commerce, from the person and
10 presence of another, namely, Victim Y.S., by force and violence and
11 by intimidation, resulting in serious bodily injury.

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1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in any of Counts One through Thirty-Three of
9 this Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any and all
13 property, real or personal, constituting, or derived from, any
14 proceeds traceable to any of the offenses; and

15 (b) To the extent such property is not available for
16 forfeiture, a sum of money equal to the total value of the property
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),
19 as incorporated by Title 28, United States Code, Section 2461(c), the
20 defendant, if so convicted, shall forfeit substitute property, up to
21 the value of the property described in the preceding paragraph if, as
22 the result of any act or omission of the defendant, the property
23 described in the preceding paragraph or any portion thereof (a)
24 cannot be located upon the exercise of due diligence; (b) has been
25 transferred, sold to, or deposited with a third party; (c) has been
26 placed beyond the jurisdiction of the court; (d) has been
27 substantially diminished in value; or (e) has been commingled with
28 other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. §§ 982 and 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Sections 982 and 924, and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offense set forth in Count Thirty-Four of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, which represents or is traceable to the gross
13 proceeds obtained, directly or indirectly, as a result of such
14 violation;

15 (b) All right, title, and interest in any firearm or
16 ammunition involved in or used in such offense, and

17 (c) To the extent such property is not available for
18 forfeiture, a sum of money equal to the total value of the property
19 described in subparagraphs (a), (b), and (c).

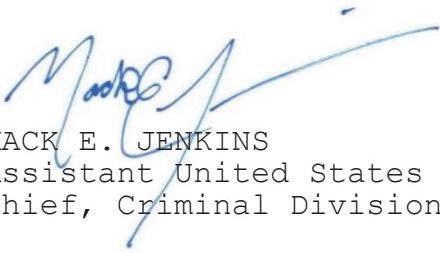
20 3. Pursuant to Title 21, United States Code, Section 853(p),
21 as incorporated by Title 18, United States Code, Section 982(b)(1)
22 and Title 28, United States Code, Section 2461(c), the defendant, if
23 so convicted, shall forfeit substitute property if, by any act or
24 omission of the defendant, the property described in the preceding
25 paragraph, or any portion thereof: (a) cannot be located upon the
26 exercise of due diligence; (b) has been transferred, sold to, or
27 deposited with a third party; (c) has been placed beyond the
28 jurisdiction of the court; (d) has been substantially diminished in

1 value; or (e) has been commingled with other property that cannot be
2 divided without difficulty.

3 A TRUE BILL
4

5 /s/
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
10 MACK E. JENKINS
11 Assistant United States Attorney
Chief, Criminal Division

12 JEFFREY M. CHEMERINSKY
13 Assistant United States Attorney
14 Chief, Violent & Organized Crime
Section

15 JENA A. MACCABE
16 Assistant United States Attorney
Violent & Organized Crime Section